

United States District Court
for Delaware

Detlef Hartmann, and as one of classes,
Petitioner,
v.
Brady, et. al.,
Respondents.

No. 06-340-***

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 APR -6 PM 4:15

Motion For Appointment of Counsel and Affidavit

Petitioner requests this Court appoint counsel to represent him, and as one of classes - inmates, and the subclass of mentally disabled, in this case for the following reasons:

1. The Petitioner is unable to afford counsel;
2. The issues in this case are obviously complex, and many;
3. This Petitioner continues to be denied legal access to information for legal access to courts due to lack of timely, equal, effective, meaningful, capable, and adequate access to both as explained in Petition, and Respondents continue deliberate indifference to law, under color of law;
4. Petitioner has limited knowledge, experience of law;
5. is mentally disabled as per Petition;
6. is unable to do necessary legal work in time due to custodians created handicaps, disabilities to and in him;
7. Petitioner is over-loaded with cases due to custodians / state employees massive illegal prison conditions compounding and depending on each other, as started to show in Petition, to access courts legally;

8. Counsel needed for pretrial^{+trial} legal work needing doing;
9. and because unable and handicapped by illegal prison conditions;
10. number of Respondents/ Defendants;
11. experts needed;
12. depositions, interrogatories, investigations, research, Petitioner cannot do nor has access to;
13. many smaller harm, damage, and injury cases have been appointed counsel;
14. Custodians, per previous Supplement filed, deny petitioner by threats, intimidation, coercion, and actual forcing to throw away legal materials when Petitioner had sufficient space for all under his bed; and illegal prison rule continues to exist contrary to law under past mismanagement living above the law, for legal materials possession; continues, systemic, systematic deprivation of laws by custodians ill-will, maliciousness, and sadistic conduct to me;
15. Inability to present the case as shown by Judge Jordans evaluation so far.

Sworn this day under penalty of perjury.

Respectfully yours,

Dated: Apr 2, 2007

Dettel Hartmann

SBI No. 229843

Delaware Correctional Center

Smymna, DE 19977

UNIT: Delbert Hartmann
SBI# 229843 UNIT T2
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Legal Mail

United States District Court
For Delaware
Boys' Bldg
844 KING STR.
LOCKER BOX 18
WILMINGTON, DE 19801

